

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**KATIE FONDREN CARSON, as Administratrix  
of the Estate of Brian Christopher Ray, et al.**

**PLAINTIFFS**

v.

**CAUSE NO. 3:23cv3063-HTW-LGI**

**RANKIN COUNTY, et al.**

**DEFENDANTS**

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**MOTION FOR SUMMARY JUDGMENT PREMISED ON QUALIFIED IMMUNITY**

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NOW COME Defendants Sheriff Bryan Bailey, Amanda Thompson, Joshua Bridges, Mason Black, Johnathan Franklin, Tommy Hildesheim, and Patrick Thornton, and move this Court for summary judgment on all claims against them by stating as follows:

1. Plaintiffs' [1] Complaint alleges § 1983 claims against these Defendants based on the attempted suicide of Chris Ray while incarcerated in the Rankin County Adult Detention Center on November 8, 2020, and his death on November 10, 2020.
2. Each of these Defendants are entitled to qualified immunity from all § 1983 federal claims against them.
3. To the extent there are any state law claims against these Defendants, same are barred by the Mississippi Tort Claims Act.
4. Based on the legal precedent and analysis in their accompanying Memorandum of Authorities, Defendants Bailey, Thompson, Bridges, Black, Franklin, Hildesheim, and Thornton respectfully request that all claims against them be dismissed with prejudice.
5. In support of their instant motion, these Defendants submit and rely upon the following exhibits:

- a. **Exhibit 1** – Inmate Records;
- b. **Exhibit 2** – Medical Records;
- c. **Exhibit 3** – Activity Log Report;
- d. **Exhibit 4** – Inmate Census on November 8, 2020;
- e. **Exhibit 5** – Video of Pod 214, Cell 139 on November 8, 2020 (filed conventionally);
- f. **Exhibit 6** – Shift Assignments and Time Sheets;
- g. **Exhibit 7** – Affidavit of Amanda Thompson;
- h. **Exhibit 8** – Rankin County Adult Detention Center Policies and Procedures; and
- i. **Exhibit 9** – Response to Public Records Act Request.

**WHEREFORE, PREMISES CONSIDERED**, Sheriff Bryan Bailey, Amanda Thompson, Joshua Bridges, Mason Black, Johnathan Franklin, Tommy Hildesheim, and Patrick Thornton pray that this Court grant their instant motion in its entirety and dismiss any and all claims against them with prejudice.

**RESPECTFULLY SUBMITTED**, this 10<sup>th</sup> day of May, 2024.

**BRYAN BAILEY, AMANDA THOMPSON,  
JOSHUA BRIDGES, MASON BLACK,  
JOHNATHAN FRANKLIN, TOMMY  
HILDESHEIM, & PATRICK THORNTON -  
DEFENDANTS**

**BY:** */s/ Jason E. Dare*  
**JASON E. DARE**

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